

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

AC2T, INC. d/b/a SPARTAN MOSQUITO,	:	
	:	
Plaintiff,	:	NO. 19-CV-5946-RBS
	:	
v.	:	
	:	
COLIN PURRINGTON,	:	
	:	
Defendant.	:	

**DEFENDANT’S MOTION TO DISMISS COUNT II OF AMENDED COMPLAINT**

Defendant Colin Purrington hereby moves to dismiss Count II of the Amended Complaint of AC2T, Inc. d/b/a Spartan Mosquito (“Spartan”), dated November 12, 2020, pursuant to Federal Rule of Civil Procedure 12(b)(6). The grounds for Defendant’s motion are set forth more fully in the accompanying Memorandum of Law in Support of Defendant’s Motion to Dismiss Count II of Amended Complaint.

November 25, 2020

KLEHR HARRISON HARVEY BRANZBURG LLP

By: /s/ Paige M. Willan

Paige M. Willan  
1835 Market Street, 14th Floor  
Philadelphia, PA 19103  
(215) 569-2700  
pwillan@klehr.com

*Attorneys for Defendant Colin Purrington*

**CERTIFICATION OF SERVICE**

I hereby certify that on November 25, 2020, I served a true and correct copy of the foregoing Defendant's Motion to Dismiss Count II of Amended Complaint, and the accompanying proposed order, via this Court's electronic filing system on the below-listed counsel for Plaintiff AC2T, Inc.:

Evan L. Frank, Esq.  
Alan L. Frank Law Associates, P.C.  
135 Old York Road  
Jenkintown, PA 19046  
[afrank@alflaw.net](mailto:afrank@alflaw.net)

*Counsel for Plaintiff AC2T, Inc.*

By: /s/ Paige M. Willan  
Paige M. Willan